

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Billed Party Preference)
For 0+ InterLATA Calls)

RECEIVED
AUG 1 1994
CC Docket 92-77
FCC MAIL ROOM

COMMENTS OF NORTH CAROLINA PAYPHONE ASSOCIATION, INC.

The North Carolina Payphone Association, Inc. ("NCPA") is a non-profit North Carolina corporation composed of over fifty members that own and operate private payphones. The NCPA is opposed to the implementation of Billed Party Preference ("BPP"). The NCPA feels the record in North Carolina indicates customers are capable of reaching the carrier of their choice, intra-state rates are capped at dominant carrier rates and our membership has endorsed rate ceilings on inter-state Operator Assisted Calls below the TOCSIA limits.

In North Carolina, Southern Bell is steadily removing public payphones to improve the profitability of their payphone division. In the last three years Southern Bell has removed 31% of their public payphones. The NCPA gets calls weekly from concerned businesses that no longer have payphones to serve their customers' needs. Two such customers are Peace College and Ridgecrest Conference Center (Attachments A & B). Our members currently provide payphones for these customers and hundreds more like them. If BPP is implemented we will not be able to maintain these payphones when we lose the operator service revenue. We simply cannot justify an investment of \$1,500 - \$2,000 per installation without compensation for all call traffic.

North Carolina is served by 28 local exchange telephone companies. The majority of these small independent telephone companies do not currently install payphones. BPP will restrict competition and prevent the private payphone industry from serving the payphone needs in rural areas all over North Carolina.

Competition from the private payphone industry was responsible for installing inmate phone systems in 78 of the 90 county jails in North Carolina (Attachment C). Before competition only three county jails had inmate phones installed in cell blocks by the local telephone companies (Attachment D). If BPP is mandated for inmate facilities, inmate phone service providers will suffer substantial revenue losses and significant increases in fraud resulting in the removal of inmate phones from county jails across North Carolina. The ultimate result of BPP will be to cut off inmates from communicating with their families.

The members of the NCPA are proud of our record of supporting regulatory compliance. In 1989 the NCPA established a Code of Ethics and an Education and Self-Enforcement Program to help inform payphone providers of the proper methods of operating private payphones. The NCPA mails all new Customer Owned Coin Operated Telephone ("COCOT") providers a Payphone Inspection Checklist and rate tariffs to be used in checking for compliance with North Carolina Utilities Commission rules (Attachment E).

The NCPA Self Enforcement Program periodically inspects phones for compliance and investigates consumer complaints on private payphones. The NCPA regularly assists payphone providers in making sure they are charging the correct rates and operating their equipment properly.

The NCPA is very proud of our record of working with the North Carolina Utilities Commission Public Staff in furthering investigations of violations of Commission rules. One such offender overcharged on inmate collect calls despite receiving copies of rate tariffs and a warning from the NCPA. When the offender did not stop overcharging, the NCPA turned over the complete file on this offender to the Public Staff and assisted the Staff with their investigation. Because the North Carolina Utilities Commission had set definite rate guidelines and because the Public Staff was committed to enforcing these rate guidelines the citizens of North Carolina were protected from overcharging on intra-state calls. In the final resolution of this investigation, the Public Staff and the company in question entered into a joint stipulation requiring the company to refund all overcharges to its North Carolina customers. The firm action of the North Carolina Utilities Commission Public Staff followed by notices to the other providers caused the overcharging problems to end.

The solution to any existing overcharging problem on inter-state calls is for the FCC to mandate rate ceilings with stiff penalties. The responsible members of our industry do not want a few "bad apples" to ruin our industry. Please remember as competitors we do not want to compete with any

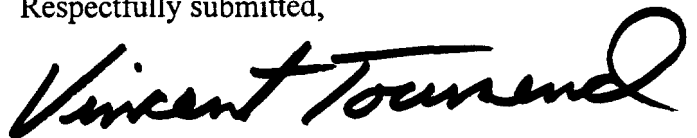
company that is inflating its revenues and commissions through overcharging. We are at a definite competitive disadvantage with such companies and we will work to see that the companies overcharging the public are exposed and dealt with firmly by the appropriate regulatory agency.

Most all county inmate phone service contracts have standard language requiring the service provider to "comply with all local, state and federal laws and regulations." Firm rate guidance by the FCC would provide a legal benchmark for local officials to use in enforcing rate compliance.

In an effort to help provide some guidelines in selecting an Inmate Phone Service Provider for North Carolina Sheriffs the NCPA worked directly with the Attorney General's Office in preparing a Memorandum which alerted Sheriffs to the potential problem of overcharging on inter-state calls. Through this education program over the past year, new inmate phone service contracts are specifically requiring charges for collect calls to equal Bell or AT&T rates.

Our message: Mandate rate ceilings and competition will rid our industry of the "bad apples." In North Carolina we are not talking about something we plan to do, we are talking about something we have a five year history of keeping a commitment to protect our customers and our industry.

Respectfully submitted,

A handwritten signature in black ink that reads "Vincent Townsend". The signature is fluid and cursive, with a large, looping "V" and "T".

Vincent Townsend, President
North Carolina Payphone Association, Inc.
9 Oak Branch Drive
Greensboro, N.C. 27407
(910) 547-0045

North Carolina Payphone Association
July 29, 1994
Attachment A

Fifteen East Peace Street
Raleigh, NC 27604-1194
Telephone 919 832-2881
Facsimile 919 834-6755



June 27, 1994

The Honorable Reed E. Hundt
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Washington, DC 20054

RECEIVED

AUG 1 1994

FCC MAIL ROOM

Dear Mr. Hundt:

I wish to comment on Docket No. 92-77 before the FCC concerning Billed Party Preference (BPP). We strongly oppose adoption of BPP for the following reasons:

- BPP will cause a further decline in the quantity and quality of publicly available phone service. Four years ago, Peace College had several public pay telephones. Southern Bell has systematically removed a phone each year since. This year, we were informed that our revenues did not meet their requirements and they were removing our last phone. My only alternative was to pay Southern Bell about \$50/month and they would leave one phone on campus. They would receive all revenues (local and long distance) from the phone. Despite my pleas for assistance in this matter, Southern Bell was adamant in their position. Finally, I arranged for a private pay telephone company to install (at no cost to the College) a single telephone. However, because our College is small and revenues are limited, they receive all commissions and revenues for the unit. The adoption of BPP would, over a period of time, reduce this revenue stream to the private company and in turn, I would no longer have a public pay telephone. Every institution must have pay telephones available to the students, employees and general public. The adoption of BPP would contribute to unnecessary expense throughout higher education.

- We have a telephone modernization program underway for dormitory students that is funded in great part from commissions earned from a primary long-distance provider. The BPP option would undermine these arrangements and in the long run add to the expense of providing telephone service.

Thank you, in advance, for your consideration of our request.

Sincerely,

Dan J. Beakey
Vice President for Business and Finance

DJB:rbl

cc/ The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness



P. O. Box 128, Exit 66, I-40 and Old U. S. 70 East, Ridgecrest, NC 28770
(704) 669-8022 phone (704) 669-9721 fax

RECEIVED

AUG 1 1994

FCC MAIL ROOM

July 7, 1994

The Honorable Reed F. Hundt
Federal Communications Commission
1919 M St. N.W.
Washington, D.C. 20554

RE: BILLED PARTY PREFERENCE
CC Docket No. 92-77

Dear Sir:

Ridgecrest Conference Center is a year-round, Baptist sponsored center in the western North Carolina mountains. We have 750 rooms with NO PHONES IN ANY ROOMS, therefore; our over 60,000 yearly guests from across the U. S. A. must have access to pay telephones.

We asked a private payphone vendor to supply us with payphones after the local phone company removed over half of our phones reducing the payphone service to our guests by over 60%. This removal of payphones was totally unacceptable to us.

Since over 80% of our calls are 0 + (charge card, reverse charges, etc.) our payphone vendor advises us that if "Billed Party Preference" is implemented that they would also have to remove their payphones due to the tremendous loss in revenue.

Activity reports on our phones have shown me that the current system of access codes (10288-10ATT) is working fine and our guests have easy access to the carrier of their choice.

I am sure that our operation is only one of many thousands who feel as we do, and hope that the dialing system will not be made any more confusing and costly, such as "Billed Party Preference" would do.



Your sincere consideration of our problem will be greatly appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bill Capell".

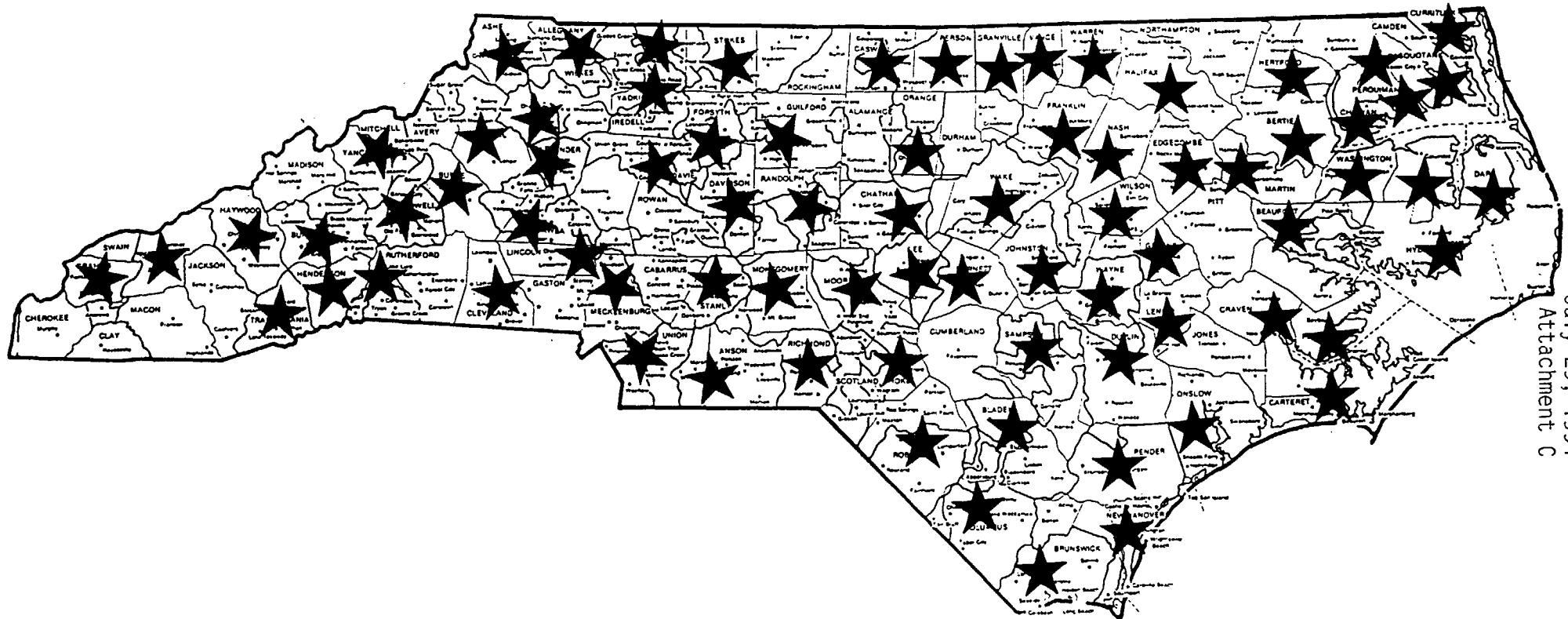
Bill Capell
Manager, Marketing and Conference Services

cc: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

BC:rv

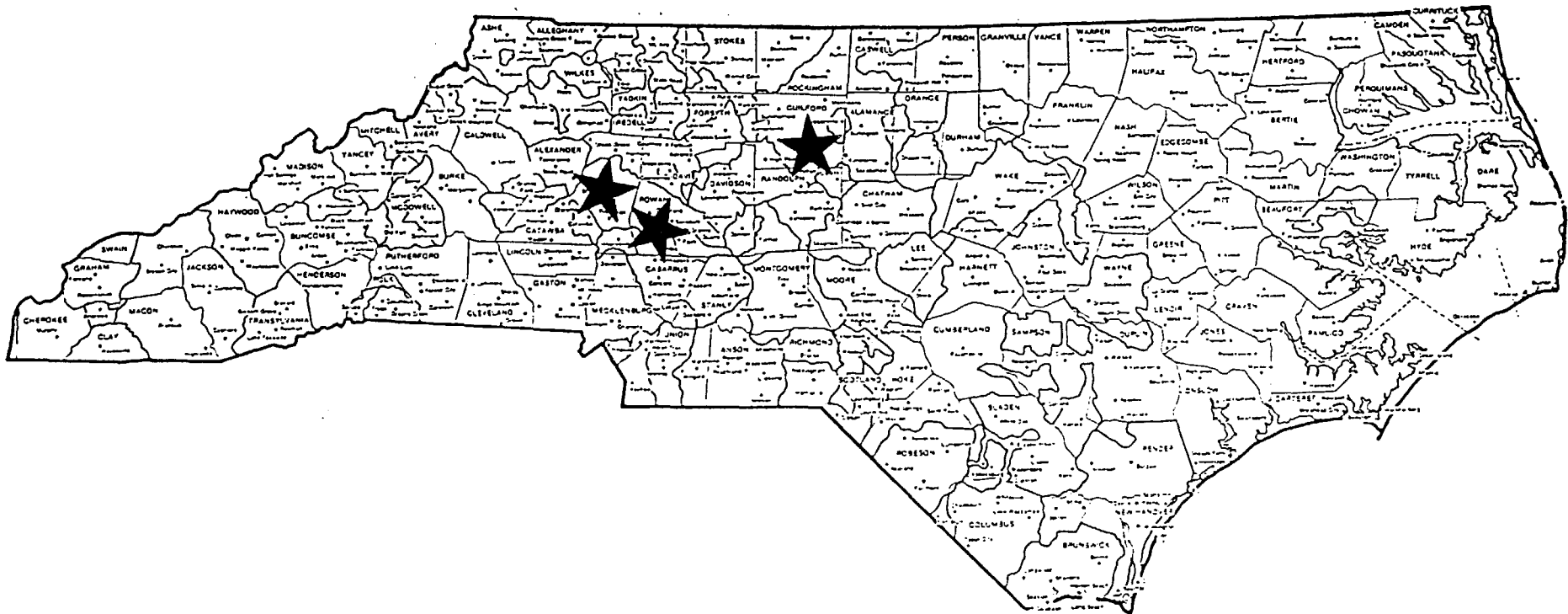
**COUNTY JAILS WITH IN CELL
UNSUPERVISED PHONE ACCESS PROVIDED BY
PRIVATE INMATE PHONE SERVICE COMPETITION**

1994



**COUNTY JAILS WITH IN CELL
UNSUPERVISED PHONE ACCESS PRIOR TO
PRIVATE INMATE PHONE SERVICE COMPETITION**

1989



NORTH CAROLINA

PAYPHONE ASSOCIATION



NCPA PAYPHONE INSPECTION PROCEDURES

P.O. Box 8179
Greensboro, NC 27419
(919) 547-0045

OFFICERS

PRESIDENT

Vincent Townsend
Pay Tel Communications, Inc.
Greensboro, NC

VICE PRESIDENT

Mack Vester
MaxTel
Rocky Mount, NC

SECRETARY/TREASURER

Lanny Miller
B-Comm
Greensboro, NC

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Charlotte, NC

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Communications Central, Inc.
Charlotte, NC

Steve Alexander
Peoples Telephone
Miami, FL

Glenn Lancaster
Triangle Telephone
Cary, NC

The NCPA is committed to educating all COCOT providers as to their responsibilities under N.C. Utility Commission Rules and Regulations. All newly certificated COCOT providers are mailed copies of the basic COCOT requirements by the NCPA. From time to time the NCPA Education and Self Enforcement Committee will respond to consumer complaints and conduct inspections of private payphones. Any payphones found to have possible rule violation(s) will be reported in accordance with the following procedures:

(1) NCPA will notify the COCOT provider that there is a "possibility of rule violation(s)." A statement signed by the COCOT provider must be returned to the NCPA within two weeks verifying the possibility of rule violations has been resolved.

(2) The payphone in question will be checked for compliance with the rules and regulations within thirty days from original notification.

If the payphone is found to still have possible rule violation of a serious nature the NCPA will report the possibility of rule violations to the North Carolina Utility Commission Public Staff - Communications Division.

NORTH CAROLINA PAYPHONE ASSOCIATION

CODE OF ETHICS

This code expresses in general terms the level of professional conduct expected of Members of the North Carolina Payphone Association. Such a code is no guarantee of moral actions on the part of the members, but depends upon the integrity of each individual member to conduct himself or herself in a responsible and straightforward manner both in dealings with clients and other professionals.

Each member of the North Carolina Payphone Association shall subscribe to the following Code of Ethics:

We will operate and conduct our businesses in a lawful and ethical manner abiding at all times with both the letter and spirit of the laws of our state and nation and the regulations of the North Carolina Utilities Commission as they pertain to our industry.

We will further the public interest by contributing to the development of a better understanding of the privately owned pay telephone industry by conducting our businesses fairly, honestly, and competently in the communities within which we operate.

We will present our qualifications to prospective subscribers solely in terms of our ability, experience, and reputation and will strive continuously to improve our knowledge, skills, and techniques to make available to our clients the benefits of our professional attainments.

We will always be mindful of the trust placed in us by our subscribers and of our responsibility to render services at the highest level of quality.

We will assure that all our employees are carefully trained so that they will clearly understand company operations, policies, and procedures and the regulations of the North Carolina Utilities Commission.

We will apply uniform and equitable standards of employment opportunity and assure that the best possible use is made of the abilities of our employees regardless of race, creed, color, sex, or age.

We will endeavor to provide opportunity for the professional advancement of those service employees who enter our industry by assisting them to acquire additional knowledge and competence in their technical skills and to keep up with significant advances in the state of the art.

We will maintain a wholly professional attitude toward those we serve, those who assist us, other firms in the industry, the members of other professions, and the practitioners of allied arts and sciences.

We will respect the reputation and practice of other firms in the privately owned pay telephone industry, but we will expose to the North Carolina Payphone Association, without hesitation, conduct which may be out of compliance or unethical so corrective action may be taken.

We will respect the Location Agreements of fellow Association members and we will not knowingly make false statements about their professional work or products, nor maliciously injure or attempt to injure the business of a fellow Association member, or the business relationship a fellow Association member has with his/her clients.

I have read the North Carolina Payphone Association Code of Ethics and agree to uphold the principles set forth.

Pay Tel Communications, Inc.
Company

Signature

Date

PAYPHONE INSPECTION CHECKLIST

=====

SITE SERIAL #: _____ DATE: _____

LOCATION: _____ TECH: _____

ADDRESS: _____

*on phone
inst card _____

PAYPHONE #: _____

=====

REQUIRED POSTINGS (Check off if in place & legible. Note exceptions)

Provider Name & Address _____ Repair/Refund Procedure _____

Provider Certificate # _____ Emergency # _____

Payphone Address _____ Name of IXC _____

Payphone Phone Number _____ Operating Instructions _____

=====

FUNCTIONAL CHECKS (Check off if operating properly. Exceptions should be reported to main office
IMMEDIATELY to be corrected.)

911 to Emergency & Free? _____ 411 to Info & Free? _____

0 to LEC Operator? _____ 00 to IXC Operator? _____

1-919-555-1212 Free? _____ 1-704-555-1212 Free? _____

1-703-555-1212 Results? _____ 1-800-555-1212 Free? _____

800 Calls Free? _____ 0+XXX-XXX-XXXX to IXC? _____

Local Calls \$.25? _____ Accepts Incoming Calls? _____

Keypad Open After Dial? _____ Accepts All Coins? _____

Returns Coins Properly? _____ Makes Calling Card Calls? _____

976 & 1-900 Invalid? _____ 211 to Refund/Repair? _____

10XXX1+ Invalid? _____ 10XXX0+10 Valid? _____

10XXX011 Invalid? _____ 950-XXXX Valid & Free? _____

102880 to AT&T? _____ 102220 to MCI? _____ 103330 to SPRINT? _____

=====

EQUIPMENT CHECKS (Note exceptions)

Complete & Current Directory and Binder In Place? _____

Phone and Immediate Area Clean? _____

Enclosure Free of Marks and Grafitti? _____

Light Bulb Burning? _____

Interface Seal Intact? _____

Phone Line Secure? _____

=====

I+ CALLS RATING CHECKS (Write in rate given for each call)

Greensboro (919) 299-2525 _____ Charlotte (704) 845-6664 _____

Raleigh (919) 549-0000 _____ Asheville (704) 258-3297 _____

Fayetteville (919) 485-1000 _____ Norfolk (804) 539-8800 _____

INSTRUCTIONS FOR INSPECTION CHECKLIST

ITEM	INSTRUCTIONS
ADDRESS:	If the address that appears on the phone instruction card is unusable for directions, ie., RT 2 BOX 400, please give an address that could be used for directions for police or emergency crews. (Location relative to a key intersection, etc.)
PROVIDER PHONE #:	Phone # on instruction card should be in place and legible.
REPAIR/REFUND PROC:	Repair and Refund procedures should be explained on the instruction card, and a 211 plate should be on the faceplate.
PROVIDER'S CERT #:	Provider's COCOT Certificate # should be listed on the lower information card. (Should be SC-62).
EMERGENCY #:	Emergency # (911) should appear on the upper instruction card.
PROVIDER'S NAME & ADDRESS:	Provider's name and address should appear on the lower instruction card.
NAME OF IXC:	Interexchange carrier should be listed on the lower instruction card. Confirm by writing the name(s) of the IXC shown.
PAYPHONE ADDRESS & #:	Name and address should be in place and legible on the upper instruction card.
OPERATING INST:	The operating instructions should be legible on the upper housing card.
911 EMERGENCY:	Test 911 to confirm that it goes to the emergency # (or operator) and that it is a free call.
411 FREE?:	Test 411 to confirm local D/A access, and that it is a free call.
0 to LEC OPERATOR:	Write in the results of dialing 0. Should get LEC Operator.
00 to IXC OPERATOR:	Write in results of dialing 00. Should get operator.
D/A RESULTS:	In-State D/A should be free, Inter-State should be \$.60, 800 D/A free. Note any exceptions.
800 FREE:	Make an 800 call. Should be valid and free.
0+XXX-XXX-XXXX TO IXC:	Dial a number as 0+. Should go to IXC.
LOCAL CALLS \$.25:	Dial a local #. Should be \$.25.
ACCEPTS INCOMING CALLS:	Check to ensure that the phone can accept incoming calls.
KEYPAD OPEN AFTER DIAL:	Check to ensure that the keypad is still open during a call.
ACCEPTS ALL COINS:	Make NICKEL/DIME TEST and QUARTER TEST to confirm coin paths.
RETURNS COINS PROP:	NICKEL/DIME TEST should return coins.
MAKES CARD CALLS:	Confirm that phone will make calling card calls. Note exceptions.
976,900 INVALID:	Dial a 1-900 and 976-xxxx call. Should be invalid.
211 TO REPAIR/REFUND:	Dial 211. Should go to proper repair/refund service.
10XXX1+ INVALID:	Dial 10XXX and a 1+ number. Should be invalid.
10XXX0+10 DIGITS VALID:	Dial 10XXX0 and a 10 digit number. Should get proper IXC.
10XXX011 INVALID:	Dial 10XXX011 to test international. Should be invalid.
950-XXXX VALID & FREE:	Dial a number 950-XXXX. Should be valid & free.
10XXX CHECKS:	Make test calls on the listed IXCs. Should get proper IXC identification.
DIRECTORY:	Check date and condition of directory & facility. Should be current and complete. If not, note condition and replace.
PHONE AREA CLEAN:	Check for cleanliness of immediate area. If dirty, note action taken.
GRAFITTI:	Clean any marks or grafitti from phone and enclosure. If parts are needed, note on form.
LIGHT BULB BURNING:	Light bulb should be working. Note if replaced.
INTERFACE SEAL INTACT:	If applicable at location, confirm that seal is in place and intact. Note exceptions in detail.
PHONE LINE SECURE:	Check to ensure that phone line is not exposed at <u>ANY</u> point between phone and interface. Note exceptions in detail.
1+ TEST CALLS:	Dial the listed numbers as 1+ and write in the rate quotation the phone gives. ex. \$1.55/1st min, etc.

JAIL PHONE INSPECTION CHECKLIST

=====

COUNTY: _____ DATE: _____

CELL: _____ TECH: _____

ADDRESS: _____

STATE: _____ PAYPHONE #: _____

=====

PHONE INSTRUCTIONS

Ensure that instructions on how to use the phone are available to the guard and visible to the inmates from each cell block.

Notes: _____

=====

FUNCTIONAL CHECKS (Check off if operating properly. Otherwise make notes to describe problem and suggested solution.)

Time limit no less than 10 mins: _____

Incoming calls blocked: _____

Positive acceptance required to complete calls: _____

Calls to information are blocked: _____

Prisoners have some access to a directory.
(Check with jailer.) _____

Check phone for contraband: _____
(If found do not touch, and notify guard immediately.)

Notes: _____

=====

CALLS THAT SHOULD RETURN A FAST BUSY (circle Y for yes N for no.)
Exceptions should be reported to main office IMMEDIATELY to be corrected, and describe below what the phone does.

Local direct calls	Y or N	800 XXX XXXX Calls	Y or N
Intralata direct calls	Y or N	900 XXX XXXX Calls	Y or N
Interlata direct calls	Y or N	XXX 976 XXXX Calls	Y or N
Interstate direct calls	Y or N	XXX 950 XXXX Calls	Y or N
Credit card calls	Y or N	911	Y or N
Third party billing	Y or N	10XXX	Y or N

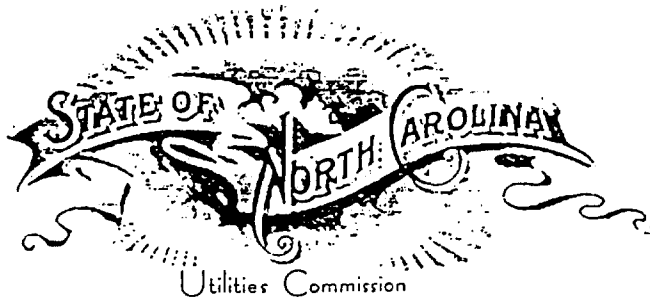
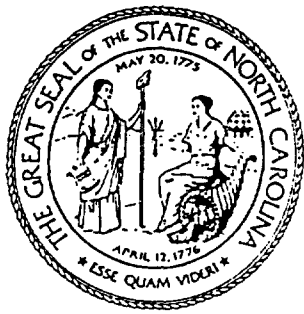
Notes: _____

=====

RATES (Contact Local Telephone Company, North Carolina Utility Commission or North Carolina Payphone Association for copies of tariffs).

COST OF LOCAL COLLECT CALLS BY LOCAL EXCHANGE COMPANY

[illegible]



I, Geneva S. Thiopen, Clerk of
the North Carolina Utilities Commission, do hereby certify
the following and hereto attached (one (1) sheets)
to be a true copy from the records of this office viz;

Tariff of AT&T Communications of the Southern States, Inc., Docket NO.
P-140, Sub 30.

Ninth. Revised Page 7.1
Issued May 15, 1991
Effective June 16, 1991

In Witness Whereof I have hereunto set my hand and
affixed the official seal of the Commission.

Done in office at Raleigh, this eighteenth day
of May in the year of our Lord 19 92.



Geneva S. Thiopen
Clerk

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.
GENERAL SERVICES TARIFF
NORTH CAROLINA

ISSUED: April 13, 1994
BY: Judy Watts-Tariff Administrator

EFFECTIVE: April 27, 1994
TWELFTH REVISED PAGE 7.1
CANCELS ELEVENTH REVISED PAGE 7.1

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A11. MESSAGE TELECOMMUNICATIONS SERVICE

A11.3 Two-Point Service (Cont'd)

A11.3.1 Service Between Telephones (Cont'd)

G. Rates Applicable For Hearing Or Speech Impaired Persons (Cont'd)

3. Rates for certain MTS calls are reduced for individuals equipped with TDDs for communicating with hearing or speech impaired persons under the following conditions:
 - a. The customer uses a TDD or other non-voice equipment for communicating with other TDDs or non-voice equipment.
 - b. The customer makes a one time written application for eligibility to the Company for reduced MTS rates.
 - c. The reduced rates are given as a credit on a subsequent bill.
 - d. The reduced rates specified in A11.3.1G.4 following apply for all calls placed between TDDs.
4. A qualified call receives an additional 50% discount over the standard time of day rates specified in A11.3.1H following.

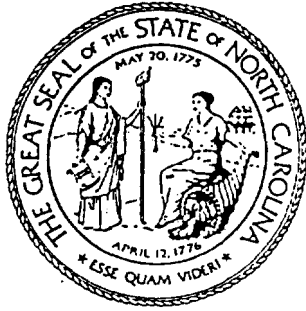
H. Rate Tables

Rates shown in the following tables are applicable to intrastate long distance calling between all points within the State of North Carolina for classes of service indicated.

1. Dial Station

RATE MILEAGE	DAY		EVENING/DAY SAVE		NIGHT/WEEKEND	
	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE
1 - 10	0.1600 R	0.1100	0.1275	0.0825	0.1071	0.0693
11 - 16	0.1900	0.1400	0.1575	0.1050	0.1323	0.0882
17 - 22	0.1900	0.1700	0.1700 R	0.1200 R	0.1500 R	0.1071
23 - 30	0.2300	0.1800	0.1800	0.1400 I	0.1600	0.1134
31 - 55	0.2300	0.2200	0.1800	0.1700	0.1600	0.1386
56 - 70	0.2400	0.2400 I	0.1900	0.1900	0.1700 R	0.1449
71 - 124	0.2700	0.2700	0.2000	0.2000	0.1800 I	0.1575
125 - 292	0.2700	0.2700 I	0.2000	0.2000	0.1900 I	0.1575
293+	0.2700 R	0.2700	0.2100 R	0.2100 I	0.1900 R	0.1900 I

T



I, Geneva S. Thigpen, Clerk of
the North Carolina Utilities Commission, do hereby certify
the following and hereto attached (two (2) sheets)
to be a true copy from the records of this office viz:

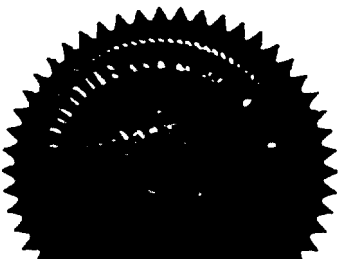
AT&T Communications of the Southern States, Inc. Tariff, Docket
No. P-140, Sub 33.
Seventh Revised Page 8
Issued February 28, 1992
Effective March 15, 1992

AT&T Communications of the Southern States, Inc. Tariff, Docket
No. P-140, Sub 33.
Original Page 8.2
Issued February 28, 1992
Effective March 15, 1992

*In Witness Whereof I have hereunto set my hand and
affixed the official seal of the Commission.*

Done in office at Raleigh, this eighteenth day
of May in the year of our Lord 1992.

Geneva S. Thigpen
Clerk



AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.
GENERAL SERVICES TARIFF
NORTH CAROLINA

ISSUED: April 13, 1994

EFFECTIVE: April 27, 1994

BY: Judy Watts-Tariff Administrator

TENTH REVISED PAGE 8

CANCELS NINTH REVISED PAGE 8

94 MAY -2 PM 2:29

All. MESSAGE TELECOMMUNICATIONS SERVICE

All.3 Two-Point Service (Cont'd)

All.3.1 Service Between Telephones (Cont'd)

H. Rate Tables (Cont'd)

7. Service Charges and Surcharges

The following charges are in addition to the Basic Rate Table preceding when the call is placed using the following operator services:

		Service Charge Billed To	
		Calling Card	Other Than .
		AT&T	AT&T
		CIID/891	CIID/891
		Card	Card
a. Station			
(1) Customer Dialed Calling Card Station			
Customer Dialed/Automated	\$0.80		\$0.80
Customer Dialed and Operator Assisted	\$0.80		\$0.80
Customer Dialed-Operator Must Assist	\$0.80		\$0.80
(2) Operator Dialed Calling Card Station	\$2.05 I		\$2.05 I
		Billed to	
		AT&T	
		CIID/891	All Other
		Card	Calls
(3) All other*			
Collect			\$2.05 I
Billed to Third Number			\$2.11
Sent Paid-Non Coin			\$2.05 I
Sent Paid-Coin			\$1.75 R
b. Person*			
(1) All Calls	\$3.50		\$3.50
c. Operator Dialed Surcharge*			\$1.00 I

*Includes Real Time Rated calls

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.
GENERAL SERVICES TARIFF
NORTH CAROLINA

ISSUED: February 28, 1992
BY: Mr. Don Stewart - Tariff Director

EFFECTIVE: March 15, 1992
ORIGINAL PAGE 8.2

All. MESSAGE TELECOMMUNICATIONS SERVICE

All.3 Two-Point Service (Cont'd)

All.3.1 Service Between Telephones (Cont'd)

H. Rate Table (Cont'd)

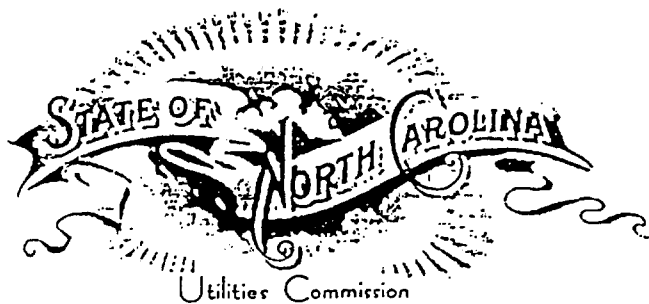
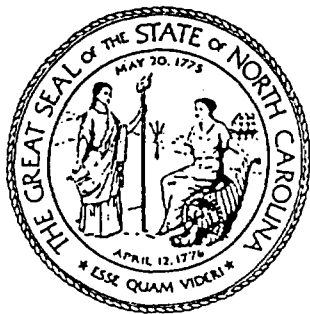
5. Application of Service Charges and Surcharges

TYPE OF CALL	OPERATOR SERVICE CHARGE	OPERATOR DIALED SURCHARGE
Dial Station (customer dialed 1+)	No	No
Customer Dialed Calling Card Station (0+)	Yes	No
Operator Station (customer dialed 0+) collect, billed to third number	Yes	No
Operator Station (operator dialed 0-) collect, billed to third number sent paid	Yes	Yes
Operator Station (operator dialed 0-) billed to a calling card	Yes	No
Person-to-Person (customer dialed 0+) collect, billed to third number, calling card, sent paid	Yes	No
Person-to-Person (operator dialed 0-) collect, billed to third number, sent paid	Yes	Yes
Person-to-Person (operator dialed 0-) billed to a calling card	Yes	No
Real Time Rated (customer dialed 0+) coin paid, time and charges	Yes	No
Real Time Rated (operator dialed 0-) coin paid, time and charges	Yes	Yes

DOCKET NO. 140 SUB 33
Allowed To Become Effective Pursuant
To G. S. 62-130 and G. S. 62-134

FEB 28 1992

FILED
N. C. UTILITIES COMMISSION



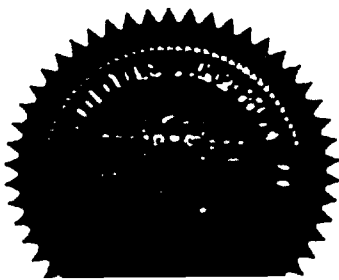
I, Geneva S. Thigpen, Clerk of
the North Carolina Utilities Commission, do hereby certify
the following and hereto attached (two (2) sheets)
to be a true copy from the records of this office viz;

Tariff filing in the matter of Southern Bell Telephone and Telegraph
Company, Docket No. P-55, Sub 927C.

General subscriber Service Tariff, Section A18, Fourth revised Page 4
and Third Revised Page 5, effective September 6, 1990.

In Witness Whereof I have hereunto set my hand and
affixed the official seal of the Commission.

Done in office at Raleigh, this fourteenth day
of April in the year of our Lord 19 92.



Geneva S. Thigpen
Clerk

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY
NORTH CAROLINA
ISSUED: April 27, 1990
BY: Vice President
Charlotte, North Carolina

GENERAL SUBSCRIBER SERVICE TARIFF

Fourth Revised Page
Cancels Third Revised Page

EFFECTIVE: September 6, 1990

A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

A18.3 Two-Point Service (Cont'd)

A18.3.1 Service Between Land Wire Telephones (Cont'd)

H. Rate Table.

Rates shown in the following table are applicable to intraLATA intrastate business between all points within the same LATA and within the state.

1. Basic Rate Table for all Classes of Service¹

Rate Mileage	Day	
	Initial 1 Minute	Each Additional Minute
0-10	\$.16	\$.10
11-16	.20	.14
17-22	.23	.16
23-30	.27	.19
31-40	.37	.23
41-55	.45	.28
56-70	.45	.28
71-124	.47	.33
125-196	.51	.35
197-292	.51	.35

2. Additional Charges

- a. The following charges are in addition to the Basic Rate Table preceding when the call is placed using the following operator services:

(1) Station

	Charge Per Call	USOC	
(a) Customer Dialed Calling Card (Credit Card) ²	\$.50	NA	(T)
(b) All other	1.25	NA	

(2) Person

(a) All calls	2.50	NA
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Note 1: Discounts apply as shown in A18.3.1.H.3. following.

Note 2: Commercial credit cards may only be used at Company Coin/Coinless Credit Card sets. (N)

DOCKET NO. 55 SUB 927C
Allowed To Become Effective Pursuant
To G. S. 62-130 and G. S. 62-134

APR 27 1990

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N. C. UTILITIES COMMISSION

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY
NORTH CAROLINA
ISSUED: April 27, 1990
BY: Vice President
Charlotte, North Carolina

GENERAL SUBSCRIBER SERVICE TARIFF

Third Revised Page
Cancels Second Revised Page
EFFECTIVE: September 6, 1990

A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

A18.3 Two-Point Service (Cont'd)

A18.3.1 Service Between Land Wire Telephones (Cont'd)

H. Rate Table (Cont'd)

3. Discounts and Applicable Rate Periods

- a. Discounts apply equally to total charges for all messages with total fractional amounts rounded down to the lower cent. Discounts do not apply to add on charges for Customer Dialed Calling Card (*Credit Card*), Other Operator Station or Person Charges shown in A18.3.1.H.2 preceding.

	Applicable Discounts						
	Mon.	Tues.	Wed.	Thur.	Fri.	Sat.	Sun.
8:00 AM to 12:00 Noon ¹	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	50% Disc.	50% Disc.
12:00 Noon to 1:00 PM ¹	25% Disc.	25% Disc.	25% Disc.	25% Disc.	25% Disc.	50% Disc.	50% Disc.
1:00 PM to 5:00 PM ¹	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	50% Disc.	50% Disc.
5:00 PM to 11:00 PM ¹	25% Disc.	25% Disc.	25% Disc.	25% Disc.	25% Disc.	50% Disc.	25% Disc.
11:00 PM to 8:00 AM ¹	50% Disc.	50% Disc.	50% Disc.	50% Disc.	50% Disc.	50% Disc.	50% Disc.

- b. Day Rate Period = Full Rate
Daytime Savings Rate Period (12:00 N - 1:00 PM, Mon. - Fri.) = 25% Discount
Evening Rate Period = 25% Discount
Night and Weekend Rate Period = 50% Discount

A18.3.2 Service Through Mobile Telephone Service Base Station

A. General

1. The regulations and rates set forth below apply for long distance message mobile telephone service furnished through the mobile telephone service base stations listed in B. following.

Note 1: To, but not including.

DOCKET NO. 55 SUB 9271
Allowed To Become Effective Pursuant
To G. S. 62-133 and G. S. 62-134

APR 27 1990

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